## IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND (Sitzing as a Court of Equity)

JOSEPH L. NELLIS, and VIVIAN W. NELLIS, his wife 7003 Glembrook Road Bethesda, Maryland

and

BERNARD L. FRISHMAN, and BELLE FRISHMAN, his wife

Complainants

VS.

Equity No. 20,525

ALLEN G. CZARNOWSKY c/o Baltimore Type and Composition Corporation 15-17 South Frederick Street Baltimore 2, Maryland

Respondent

## PETITION TO FORECLOSE AN EQUITABLE MORTGAGE

The petition of Joseph L. Nellis and Vivian W. Nellis, his wife, and Bernard L. Frishman and Belle Frishman, his wife, represents unto this Honorable Court as follows:

- 1. That your petitioner, Joseph L. Nellis and Vivian W. Nellis, his wife, are adult citizens of the United States and residents of Montgomery County, Maryland; and that petitioners Bernard L. Frishman and Belle Frishman, his wife, are adult citizens of the United States and residents of the District of Columbia. That the respondent, Allen G. Czarnowsky, is likewise an adult citizen of the United States and a Musident of Baltimore City, Maryland.
- 2. That pursuant to a Decree rendered by this Henorable Court in Equity Proceeding No. 20448 on December 16, 1963, the Honorable Patrick M. Schnauffer presiding, a copy of which is